

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

SAMUEL I. HYLAND and STEPHANIE
SPEAKMAN, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

WILLIAM B. HARRISON, JR., HANS W.
BECHERER, RILEY P. BECHTEL, FRANK
A. BENNACK, JR., JOHN H. BIGGS,
LAWRENCE A. BOSSIDY, M. ANTHONY
BURNS, ELLEN V. FUTTER, WILLIAM H.
GRAY, III, HELENE L. KAPLAN, LEE R.
RAYMOND, JOHN R. STAFFORD,
JPMORGAN CHASE & CO., and JAMES
DIMON,

Defendants.

Dr. Stephen Blau, Individually and On Behalf
of All Others Similarly Situated,

Intervenor.

Case No. 1:05-cv-162 (JJF)

[Additional Caption on the Following Page]

**MOTION OF DR. STEPHEN BLAU TO ENFORCE THIS COURT'S STAY ORDER
AND TO CONSOLIDATE AND STAY CO-LEAD PLAINTIFF SAMUEL I. HYLAND'S
RELATED CIVIL ACTION FILED ON APRIL 6, 2006**

SAMUEL I. HYLAND,
Individually and On Behalf of All Others
Similarly Situated,

Plaintiff,

J.P. MORGAN SECURITIES, INC.,
A Delaware Corporation,

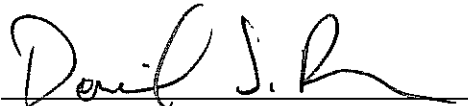
Defendant.

Case No. 06-224 (JJF)

Dr. Blau, by his counsel, hereby moves to enforce this Court's Stay Order in *Hyland, et al. v. Harrison, et al.*, C.A. No. 05-162 JJF, and to consolidate the action styled *Hyland v. J.P. Morgan Securities Inc.*, Civil Action No. 1:06-cv-224 with C.A. No. 05-162 JJF, pursuant to Federal Rule of Civil Procedure 42(a), and stay both actions pending the resolution of the action styled *Blau v. Harrison, et al.*, Case No. 04 C 6592 (N.D. Illinois). The grounds for this motion are more fully set forth in Dr. Blau's Brief In Support of his Motion To Enforce This Court's Stay Order And To Consolidate And Stay Co- Lead Plaintiff Samuel I. Hyland's Related Civil Action Filed On April 6, 2006 and in the accompanying Affidavit of Aya Bouchededid in support of this Motion.

Dated: April 18, 2006

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SAMUEL I. HYLAND and STEPHANIE
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Defendants.

Dr. Stephen Blau, Individually and On Behalf
of All Others Similarly Situated,

Intervenor.

Case No. 1:05-cv-162 (JJF)

[Additional Caption on the Following Page]

**[PROPOSED] ORDER GRANTING THE MOTION OF DR. STEPHEN BLAU TO
ENFORCE THIS COURT'S STAY ORDER AND TO CONSOLIDATE AND STAY CO-
LEAD PLAINTIFF SAMUEL I. HYLAND'S RELATED CIVIL ACTION FILED ON
APRIL 6, 2006**

SAMUEL I. HYLAND,
Individually and On Behalf of All Others
Similarly Situated,

Plaintiff,

J.P. MORGAN SECURITIES, INC.,
A Delaware Corporation,

Defendant.

Case No. 06-224 (JJF)

Upon consideration of the Motion of Dr. Stephen Blau to Enforce this Court's Stay Order and to Consolidate and Stay Co-Lead Plaintiff Samuel I. Hyland's Related Civil Action Filed on April 6, 2006, it is hereby decreed and ordered that:

1. The action styled *Hyland v. J.P. Morgan Securities Inc.*, Civil Action No. 1:06-cv-224 shall be consolidated with this action, pursuant to Federal Rule of Civil Procedure 42(a).
2. Both actions shall be stayed pending the resolution of the action styled *Blau v. Harrison*, et al., Case No. 04 C 6592 (N.D. Illinois) in accordance with this Court's Stay Order, issued on February 7, 2006 (D.I. 93).

Dated: _____, 2006

BY THE COURT:

United States District Judge

CERTIFICATE OF SERVICE

I, Daniel J. Brown, do hereby certify that on this 18th day of April, 2006, I caused copies of the foregoing Motion, Brief, and Affidavit to be served in the manner indicated below.


BY E-FILING:

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Daniel J. Brown (#4688)